

1 Michael J. Bowe
2 (*pro hac vice* application forthcoming)
3 mbowe@brownrudnick.com
4 Lauren Tabaksblat
5 (*pro hac vice* application forthcoming)
6 ltabaksblat@brownrudnick.com
7 **BROWN RUDNICK LLP**
8 7 Times Square
9 New York, NY 10036
10 Telephone: (212) 209-4800
11 Facsimile: (212) 209-4801

12 David M. Stein (#198256)
13 dstein@olsonstein.com
14 **Olson Stein LLP**
15 240 Nice Lane, #301
16 Newport Beach, California 92663
17 Telephone: (949) 887-4600

18 *Attorneys for Plaintiff*

19
20 UNITED STATES DISTRICT COURT
21
22 CENTRAL DISTRICT OF CALIFORNIA

23 J.C.,

24 CASE NO. 24-cv-04971

25 Plaintiff,

26
27 **PLAINTIFF'S NOTICE OF**
28 **RELATED CASES**

29 v.
30
31 MINDGEEK S.A.R.L. a foreign entity;
32 MG FREESITES LTD, a foreign entity;
33 MINDGEEK USA INCORPORATED,
34 a Delaware corporation; MG
35 PREMIUM LTD, a foreign entity; MG
36 GLOBAL ENTERTAINMENT INC., a
37 Delaware corporation; 9219-1568
38 QUEBEC, INC., a foreign entity;
39 BERND BERGMAIR, a foreign
40 individual; FERAS ANTOON, a
41 foreign individual; DAVID
42 TASSILLO, a foreign individual; VISA
43 INC., a Delaware corporation;
44 REDWOOD CAPITAL
45 MANAGEMENT, LLC, a Delaware
46 limited liability company; REDWOOD
47 DOE FUNDS 1-7; COLBECK
48 CAPITAL MANAGEMENT, LLC, a
49 Delaware limited liability company;
50 COLBECK DOE FUNDS 1-3,

51
52 Defendants.

53

54

55

56

57

58

59 CASE NO. 24-cv-04971

60 PLAINTIFF'S NOTICE OF RELATED CASES

1 J.C. hereby files this Notice of Related Cases under Central District of
2 California Local Rule 83-1.3.1. The following cases have a substantial overlap in
3 defendants and have some of the same factual allegations. It would further the
4 interests of judicial efficiency to have them heard by the same judge.

5 1. *Jane Doe v. MindGeek USA Incorporated et al.*, Case No. 8:21-cv-
6 00338-WLH-ADS, filed on February 19, 2021 in this District Court, is currently
7 pending before the Honorable Wesley L. Hsu. This is a class action seeking
8 damages and injunctive relief against defendants – (i) MindGeek USA
9 Incorporated (ii) MindGeek S.A.R.L.; (iii) MG Freesites, Ltd., (d/b/a Pornhub);
10 (iv) MG Freesites II, Ltd.; (v) MG Content RT Limited; and (vi) 9219-1568
11 Quebec Inc. (d/b/a MindGeek) – based on allegations that defendants violated the
12 Trafficking Victims Protection Reauthorization Act (“TVPRA”), specifically
13 18 U.S.C. §§ 1591 and 1595, among other laws, by financially benefiting from, or
14 otherwise participating in, a sex trafficking venture in which plaintiff and members
15 of the class were victims. Further, plaintiff alleges that the defendants violated 18
16 U.S.C. § 2258A by failing to report child sexual abuse materials on their websites
17 and 18 U.S.C. § 2252A for knowingly receiving and distributing child
18 pornography depicting plaintiff and the class on their websites. Plaintiff also
19 asserts state statutory and common law violations. On November 17, 2023, the
20 Court granted Plaintiff’s Motion for Class Certification and certified under both
21 Federal Rules of Civil Procedure 23(b)(2) and 23(b)(3) two classes. (Dkt. 209,
22 Order Granting Plaintiff’s Motion for Class Certification, *Jane Doe v. MindGeek*
23 *USA Incorporated et al.*, Case No. 8:21-cv-00338-WLH-ADS (C.D. Cal. 2021).)
24 The Court first certified a national class including “all persons who were under the
25 age of 18 when they appeared in a video or image that has been uploaded or
26 otherwise made available for viewing on any website owned or operated by
27 Defendants in the last ten years.” (Dkt. 107 at 44, ¶ 154.) The Court next certified
28 a subclass of “all persons residing in California who were under the age of 18

1 when they appeared in a video or image that has been uploaded or otherwise made
2 available for viewing on any website owned or operated by Defendants in the last
3 ten years.” (*Id.* at ¶ 155.) Plaintiff in this related action is represented by the
4 following counsel: Susman Godfrey L.L.P. and Pollock Cohen LLP.

5 2. *Serena Fleites v. MindGeek S.A.R.L. et al.*, Case No. 2:21-cv-4920-
6 WLH-ADS, filed on June 17, 2021 in this District Court, is currently pending
7 before the Honorable Wesley L. Hsu. Plaintiff in this case is seeking damages and
8 injunctive relief against defendants – (i) MindGeek S.A.R.L.; (ii) MG Freesites,
9 Ltd. d/b/a Pornhub; (iii) MindGeek USA Incorporated; (iv) MG Premium Ltd.;
10 (v) MG Global Entertainment, Inc.; (vi) 9219-1568 Quebec, Inc.;(vii) Bernd
11 Bergmair; (viii) Feras Antoon; (ix) David Tassillo; (x) Visa Inc.; (xi) Redwood
12 Capital Management, LLC¹; and (xii) Colbeck Capital Management, LLC² – for
13 sex trafficking and conspiracy to benefit from a trafficking venture in violation of
14 18 U.S.C. §§ 1591, 1594, and 1595, for receipt, transport, and possession of child
15 pornography in violation of 18 U.S.C. §§ 2252, 2252A, and 2255, and state
16 statutory and common law violations. Plaintiff in this related action is represented
17 by the following counsel: Brown Rudnick LLP and Olson Stein LLP.

18 3. *K.A. v. MindGeek S.A.R.L. et al.*, Case No. 2:24-cv-04786-JFW-
19 MAA, filed on June 7, 2024 in this District Court, is currently pending before the
20 Honorable John F. Walter and the Honorable Maria A. Audero. Plaintiff in this
21 case is seeking damages and injunctive relief against defendants – (i) MindGeek
22 S.A.R.L.; (ii) MG Freesites, Ltd., d/b/a Pornhub; (iii) MindGeek USA
23 Incorporated; (iv) MG Premium Ltd.; (v) MG Global Entertainment Inc.; (vi)
24 9219-1568 Quebec, Inc., d/b/a MindGeek; (vii) Bernd Bergmair; (viii) Feras

25
26 ¹ Plaintiff also named as defendants certain related funds of Redwood Capital
27 Management, LLC, the names of which were filed under seal.
28 ² Plaintiff also named as defendants certain related funds of Colbeck Capital
Management, LLC, the names of which were filed under seal.

1 Antoon; (ix) David Tassillo; (x) Visa Inc.; (xi) Redwood Capital Management,
2 LLC; (xii) Redwood Doe Funds 1-7; (xiii) Colbeck Capital Management, LLC;
3 and (xiv) Colbeck Doe Funds 1-3 – for sex trafficking and conspiracy to benefit
4 from a trafficking venture in violation of 18 U.S.C. §§ 1591, 1594, and 1595, for
5 receipt, transport, and possession of child pornography in violation of 18 U.S.C. §§
6 2252, 2252A, and 2255, and state statutory and common law violations. Plaintiff
7 in this related action is represented by the following counsel: Brown Rudnick LLP
8 and Olson Stein LLP.

9 4. *N.L. v. MindGeek S.A.R.L. et al.*, Case No. 2:24-cv-04788-MWF-
10 AGR, filed on June 7, 2024 in this District Court, is currently pending before the
11 Honorable Michael W. Fitzgerald and the Honorable Alicia G. Rosenberg.
12 Plaintiff in this case is seeking damages and injunctive relief against defendants –
13 (i) MindGeek S.A.R.L.; (ii) MG Freesites, Ltd., d/b/a Pornhub; (iii) MindGeek
14 USA Incorporated; (iv) MG Premium Ltd.; (v) MG Global Entertainment Inc.; (vi)
15 9219-1568 Quebec, Inc., d/b/a MindGeek; (vii) Bernd Bergmair; (viii) Feras
16 Antoon; (ix) David Tassillo; (x) Visa Inc.; (xi) Redwood Capital Management,
17 LLC; (xii) Redwood Doe Funds 1-7; (xiii) Colbeck Capital Management, LLC;
18 and (xiv) Colbeck Doe Funds 1-3 – for sex trafficking and conspiracy to benefit
19 from a trafficking venture in violation of 18 U.S.C. §§ 1591, 1594, and 1595, for
20 receipt, transport, and possession of child pornography in violation of 18 U.S.C. §§
21 2252, 2252A, and 2255, and state statutory and common law violations. Plaintiff
22 in this related action is represented by the following counsel: Brown Rudnick LLP
23 and Olson Stein LLP.

24 5. *L.T. v. MindGeek S.A.R.L. et al.*, Case No. 2:24-cv-04791-JFW-PVC,
25 filed on June 7, 2024 in this District Court, is currently pending before the
26 Honorable John F. Walter and the Honorable Pedro V. Castillo. Plaintiff in this
27 case is seeking damages and injunctive relief against defendants – (i) MindGeek
28 S.A.R.L.; (ii) MG Freesites, Ltd., d/b/a Pornhub; (iii) MindGeek USA

1 Incorporated; (iv) MG Premium Ltd.; (v) MG Global Entertainment Inc.; (vi)
2 9219-1568 Quebec, Inc., d/b/a MindGeek; (vii) Bernd Bergmair; (viii) Feras
3 Antoon; (ix) David Tassillo; (x) Visa Inc.; (xi) Redwood Capital Management,
4 LLC; (xii) Redwood Doe Funds 1-7; (xiii) Colbeck Capital Management, LLC;
5 and (xiv) Colbeck Doe Funds 1-3 – for sex trafficking and conspiracy to benefit
6 from a trafficking venture in violation of 18 U.S.C. §§ 1591, 1594, and 1595, for
7 receipt, transport, and possession of child pornography in violation of 18 U.S.C. §§
8 2252, 2252A, and 2255, and state statutory and common law violations. Plaintiff
9 in this related action is represented by the following counsel: Brown Rudnick LLP
10 and Olson Stein LLP.

11 6. *T.C. v. MindGeek S.A.R.L. et al.*, Case No. 2:24-cv-04795-MRA-PD,
12 filed on June 7, 2024 in this District Court, is currently pending before the
13 Honorable Monica Ramirez Almadani and the Honorable Patricia Donahue.
14 Plaintiff in this case is seeking damages and injunctive relief against defendants –
15 (i) MindGeek S.A.R.L.; (ii) MG Freesites, Ltd., d/b/a Pornhub; (iii) MindGeek
16 USA Incorporated; (iv) MG Premium Ltd.; (v) MG Global Entertainment Inc.; (vi)
17 9219-1568 Quebec, Inc., d/b/a MindGeek; (vii) Bernd Bergmair; (viii) Feras
18 Antoon; (ix) David Tassillo; (x) Visa Inc.; (xi) Redwood Capital Management,
19 LLC; (xii) Redwood Doe Funds 1-7; (xiii) Colbeck Capital Management, LLC;
20 and (xiv) Colbeck Doe Funds 1-3 – for sex trafficking and conspiracy to benefit
21 from a trafficking venture in violation of 18 U.S.C. §§ 1591, 1594, and 1595, for
22 receipt, transport, and possession of child pornography in violation of 18 U.S.C. §§
23 2252, 2252A, and 2255, and state statutory and common law violations. Plaintiff
24 in this related action is represented by the following counsel: Brown Rudnick LLP
25 and Olson Stein LLP.

26 7. *X.N. v. MindGeek S.A.R.L. et al.*, Case No. 2:24-cv-04800-DMG-KS,
27 filed on June 7, 2024 in this District Court, is currently pending before the
28 Honorable Dolly M. Gee and the Honorable Karen L. Stevenson. Plaintiff in this

1 case is seeking damages and injunctive relief against defendants – (i) MindGeek
2 S.A.R.L.; (ii) MG Freesites, Ltd., d/b/a Pornhub; (iii) MindGeek USA
3 Incorporated; (iv) MG Premium Ltd.; (v) MG Global Entertainment Inc.; (vi)
4 9219-1568 Quebec, Inc., d/b/a MindGeek; (vii) Bernd Bergmair; (viii) Feras
5 Antoon; (ix) David Tassillo; (x) Visa Inc.; (xi) Redwood Capital Management,
6 LLC; (xii) Redwood Doe Funds 1-7; (xiii) Colbeck Capital Management, LLC;
7 and (xiv) Colbeck Doe Funds 1-3 – for sex trafficking and conspiracy to benefit
8 from a trafficking venture in violation of 18 U.S.C. §§ 1591, 1594, and 1595, for
9 receipt, transport, and possession of child pornography in violation of 18 U.S.C. §§
10 2252, 2252A, and 2255, and state statutory and common law violations. Plaintiff
11 in this related action is represented by the following counsel: Brown Rudnick LLP
12 and Olson Stein LLP.

13 8. *N.Y. v. MindGeek S.A.R.L. et al.*, Case No. 2:24-cv-04801-CBM-JPR,
14 filed on June 7, 2024 in this District Court, is currently pending before the
15 Honorable Consuelo B. Marshall and the Honorable Jean P. Rosenbluth. Plaintiff
16 in this case is seeking damages and injunctive relief against defendants – (i)
17 MindGeek S.A.R.L.; (ii) MG Freesites, Ltd., d/b/a Pornhub; (iii) MindGeek USA
18 Incorporated; (iv) MG Premium Ltd.; (v) MG Global Entertainment Inc.; (vi)
19 9219-1568 Quebec, Inc., d/b/a MindGeek; (vii) Bernd Bergmair; (viii) Feras
20 Antoon; (ix) David Tassillo; (x) Visa Inc.; (xi) Redwood Capital Management,
21 LLC; (xii) Redwood Doe Funds 1-7; (xiii) Colbeck Capital Management, LLC;
22 and (xiv) Colbeck Doe Funds 1-3 – for sex trafficking and conspiracy to benefit
23 from a trafficking venture in violation of 18 U.S.C. §§ 1591, 1594, and 1595, for
24 receipt, transport, and possession of child pornography in violation of 18 U.S.C. §§
25 2252, 2252A, and 2255, and state statutory and common law violations. Plaintiff
26 in this related action is represented by the following counsel: Brown Rudnick LLP
27 and Olson Stein LLP.

28

1 DATED: June 12, 2024

Respectfully submitted,

2 **BROWN RUDNICK LLP**

3

4 By: */s/ Michael J. Bowe*

5 Michael J. Bowe

6 (pro hac vice application forthcoming)

7 Lauren Tabaksblat

8 (pro hac vice application forthcoming)

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Attorneys for Plaintiff